

1 ALAN G. GILCHRIST  
2 E-mail: [agilchrist@thehlp.com](mailto:agilchrist@thehlp.com)  
3 THE HEALTH LAW PARTNERS, P.C.  
4 29566 Northwestern Hwy., Ste. 200  
5 Southfield, MI 48034  
6 Telephone: (248) 996-8510  
7 Facsimile: (248) 996-8525

8  
9 DEBRA A. SPICER  
10 E-mail: [dspicer@spicerlaw.com](mailto:dspicer@spicerlaw.com)  
11 LAW OFFICES OF DEBRA A. SPICER, P.C.  
12 645 Griswold Street, Suite 1717  
13 Detroit, MI 48226  
14 Telephone: (313) 961-2100  
15 Facsimile: (313) 961-2333

16 Attorneys for Defendants  
17 SIGNATURE HEALTHCARE SERVICES,  
18 LLC and AURORA LAS ENCINAS, LLC

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

29  
30 UNITED STATES OF AMERICA and the  
31 STATE OF CALIFORNIA, *ex rel.*,  
32 SHELBY EIDSON,

33  
34 Plaintiffs,  
35 vs.

36  
37 AURORA LAS ENCINAS, LLC, LINDA  
38 PARKS, SIGNATURE HEALTHCARE  
39 SERVICES, LLC, AND DOES 1  
40 THROUGH 10, jointly and severally,

41  
42 Defendants.

43  
44 Case No.: 2:10-cv-1031 JAK (RZx)  
45 Judge: Honorable Ralph Zarefsky

46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
5510  
5511  
5512  
5513  
5514  
5515  
5516  
5517  
5518  
5519  
5520  
5521  
5522  
5523  
5524  
5525  
5526  
5527  
5528  
5529  
5530  
5531  
5532  
5533  
5534  
5535  
5536  
5537  
5538  
5539  
55310  
55311  
55312  
55313  
55314  
55315  
55316  
55317  
55318  
55319  
55320  
55321  
55322  
55323  
55324  
55325  
55326  
55327  
55328  
55329  
55330  
55331  
55332  
55333  
55334  
55335  
55336  
55337  
55338  
55339  
55340  
55341  
55342  
55343  
55344  
55345  
55346  
55347  
55348  
55349  
55350  
55351  
55352  
55353  
55354  
55355  
55356  
55357  
55358  
55359  
55360  
55361  
55362  
55363  
55364  
55365  
55366  
55367  
55368  
55369  
55370  
55371  
55372  
55373  
55374  
55375  
55376  
55377  
55378  
55379  
55380  
55381  
55382  
55383  
55384  
55385  
55386  
55387  
55388  
55389  
55390  
55391  
55392  
55393  
55394  
55395  
55396  
55397  
55398  
55399  
553100  
553101  
553102  
553103  
553104  
553105  
553106  
553107  
553108  
553109  
553110  
553111  
553112  
553113  
553114  
553115  
553116  
553117  
553118  
553119  
553120  
553121  
553122  
553123  
553124  
553125  
553126  
553127  
553128  
553129  
553130  
553131  
553132  
553133  
553134  
553135  
553136  
553137  
553138  
553139  
553140  
553141  
553142  
553143  
553144  
553145  
553146  
553147  
553148  
553149  
553150  
553151  
553152  
553153  
553154  
553155  
553156  
553157  
553158  
553159  
553160  
553161  
553162  
553163  
553164  
553165  
553166  
553167  
553168  
553169  
553170  
553171  
553172  
553173  
553174  
553175  
553176  
553177  
553178  
553179  
553180  
553181  
553182  
553183  
553184  
553185  
553186  
553187  
553188  
553189  
553190  
553191  
553192  
553193  
553194  
553195  
553196  
553197  
553198  
553199  
553200  
553201  
553202  
553203  
553204  
553205  
553206  
553207  
553208  
553209  
553210  
553211  
553212  
553213  
553214  
553215  
553216  
553217  
553218  
553219  
553220  
553221  
553222  
553223  
553224  
553225  
553226  
553227  
553228  
553229  
553230  
553231  
553232  
553233  
553234  
553235  
553236  
553237  
553238  
553239  
553240  
553241  
553242  
553243  
553244  
553245  
553246  
553247  
553248  
553249  
553250  
553251  
553252  
553253  
553254  
553255  
553256  
553257  
553258  
553259  
553260  
553261  
553262  
553263  
553264  
553265  
553266  
553267  
553268  
553269  
553270  
553271  
553272  
553273  
553274  
553275  
553276  
553277  
553278  
553279  
553280  
553281  
553282  
553283  
553284  
553285  
553286  
553287  
553288  
553289  
553290  
553291  
553292  
553293  
553294  
553295  
553296  
553297  
553298  
553299  
553300  
553301  
553302  
553303  
553304  
553305  
553306  
553307  
553308  
553309  
553310  
553311  
553312  
553313  
553314  
553315  
553316  
553317  
553318  
553319  
553320  
553321  
553322  
553323  
553324  
553325  
553326  
553327  
553328  
553329  
553330  
553331  
553332  
553333  
553334  
553335  
553336  
553337  
553338  
553339  
553340  
553341  
553342  
553343  
553344  
553345  
553346  
553347  
553348  
553349  
553350  
553351  
553352  
553353  
553354  
553355  
553356  
553357  
553358  
553359  
553360  
553361  
553362  
553363  
553364  
553365  
553366  
553367  
553368  
553369  
553370  
553371  
553372  
553373  
553374  
553375  
553376  
553377  
553378  
553379  
553380  
553381  
553382  
553383  
553384  
553385  
553386  
553387  
553388  
553389  
553390  
553391  
553392  
553393  
553394  
553395  
553396  
553397  
553398  
553399  
5533100  
5533101  
5533102  
5533103  
5533104  
5533105  
5533106  
5533107  
5533108  
5533109  
5533110  
5533111  
5533112  
5533113  
5533114  
5533115  
5533116  
5533117  
5533118  
5533119  
5533120  
5533121  
5533122  
5533123  
5533124  
5533125  
5533126  
5533127  
5533128  
5533129  
5533130  
5533131  
5533132  
5533133  
5533134  
5533135  
5533136  
5533137  
5533138  
5533139  
5533140  
5533141  
5533142  
5533143  
5533144  
5533145  
5533146  
5533147  
5533148  
5533149  
5533150  
5533151  
5533152  
5533153  
5533154  
5533155  
5533156  
5533157  
5533158  
5533159  
5533160  
5533161  
5533162  
5533163  
5533164  
5533165  
5533166  
5533167  
5533168  
5533169  
5533170  
5533171  
5533172  
5533173  
5533174  
5533175  
5533176  
5533177  
5533178  
5533179  
5533180  
5533181  
5533182  
5533183  
5533184  
5533185  
5533186  
5533187  
5533188  
5533189  
5533190  
5533191  
5533192  
5533193  
5533194  
5533195  
5533196  
5533197  
5533198  
5533199  
5533200  
5533201  
5533202  
5533203  
5533204  
5533205  
5533206  
5533207  
5533208  
5533209  
5533210  
5533211  
5533212  
5533213  
5533214  
5533215  
5533216  
5533217  
5533218  
5533219  
5533220  
5533221  
5533222  
5533223  
5533224  
5533225  
5533226  
5533227  
5533228  
5533229  
55332210  
55332211  
55332212  
55332213  
55332214  
55332215  
55332216  
55332217  
55332218  
55332219  
55332220  
55332221  
55332222  
55332223  
55332224  
55332225  
55332226  
55332227  
55332228  
55332229  
55332230  
55332231  
55332232  
55332233  
55332234  
55332235  
55332236  
55332237  
55332238  
55332239  
55332240  
55332241  
55332242  
55332243  
55332244  
55332245  
55332246  
55332247  
55332248  
55332249  
55332250  
55332251  
55332252  
55332253  
55332254  
55332255  
55332256  
55332257  
55332258  
55332259  
55332260  
55332261  
55332262  
55332263  
55332264  
55332265  
55332266  
55332267  
55332268  
55332269  
55332270  
55332271  
55332272  
55332273  
55332274  
55332275  
55332276  
55332277  
55332278  
55332279  
55332280  
55332281  
55332282  
55332283  
55332284  
55332285  
55332286  
55332287  
55332288  
55332289  
55332290  
55332291  
55332292  
55332293  
55332294  
55332295  
55332296  
55332297  
55332298  
55332299  
553322100  
553322101  
553322102  
553322103  
553322104  
553322105  
553322106  
553322107  
553322108  
553322109  
553322110  
553322111  
553322112  
553322113  
553322114  
553322115  
553322116  
553322117  
553322118  
553322119  
553322120  
553322121  
553322122  
553322123  
553322124  
553322125  
553322126  
553322127  
553322128  
553322129  
553322130  
553322131  
553322132  
553322133  
553322134  
553322135  
553322136  
553322137  
553322138  
553322139  
553322140  
553322141  
553322142  
553322143  
553322144  
553322145  
553322146  
553322147  
553322148  
553322149  
553322150  
553322151  
553322152  
553322153  
553322154  
553322155  
553322156  
553322157  
553322158  
553322159  
553322160  
553322161  
553322162  
553322163  
553322164  
553322165  
553322166  
553322167  
553322168  
553322169  
553322170  
553322171  
553322172  
553322173  
553322174  
553322175  
553322176  
553322177  
553322178  
553322179  
553322180  
553322181  
553322182  
553322183  
553322184  
553322185  
553322186  
553322187  
553322188  
553322189  
553322190  
553322191  
553322192  
553322193  
553322194  
553322195  
553322196  
553322197  
553322198  
553322199  
553322200  
553322201  
553322202  
553322203  
553322204  
553322205  
553322206  
553322207  
553322208  
553322209  
553322210  
553322211  
553322212  
553322213  
553322214  
553322215  
553322216  
553322217  
553322218  
553322219  
553322220  
553322221  
553322222  
553322223  
553322224  
553322225  
553322226  
553322227  
553322228  
553322229  
553322230  
553322231  
553322232  
553322233  
553322234  
553322235  
553322236  
553322237  
553322238  
553322239  
553322240  
553322241  
553322242  
553322243  
553322244  
553322245  
553322246  
553322247  
553322248  
553322249  
553322250  
553322251  
553322252  
553322253  
553322254  
553322255  
553322256  
553322257  
553322258  
553322259  
553322260  
553322261  
553322262  
553322263  
553322264  
553322265  
553322266  
553322267  
553322268  
553322269  
553322270  
553322271  
553322272  
553322273  
553322274  
553322275  
553322276  
553322277  
553322278  
553322279  
553322280  
553322281  
553322282  
553322283  
553322284  
553322285  
553322286  
553322287  
553322288  
553322289  
553322290  
553322291  
553322292  
553322293  
553322294  
553322295  
553322296  
553322297  
553322298  
553322299  
5533222100  
5533222101  
5533222102  
5533222103  
5533222104  
5533222105  
5533222106  
5533222107  
5533222108  
5533222109  
5533222110  
5533222111  
5533222112  
5533222113  
5533222114  
5533222115  
5533222116  
5533222117  
5533222118  
5533222119  
5533222120  
5533222121  
5533222122  
5533222123  
5533222124  
5533222125  
5533222126  
5533222127  
5533222128  
5533222129  
5533222130  
5533222131  
5533222132  
5533222133  
5533222134  
5533222135  
5533222136  
5533222137

1 By Order dated October 29, 2012 [Dkt. # 290], (the "Order"), Judge Kronstadt  
2 granted Defendants Aurora Las Encinas Hospital, LLC, and Signature Healthcare  
3 Services, LLC's ("Defendants") Motion for Injunction, in part, and ordered that the  
4 parties file a Stipulation relative to all patient related documents in Realtor's possession  
5 relative to individuals who were patients at Defendant ALEH (the "Documents").  
6 Documents that are not related to Defendant ALEH patients, such as Relator's pay stubs  
7 or hospital policies, are not subject to the Order. Specifically, Judge Kronstadt ordered  
8 that the Stipulation identify which of the Documents Relator must deposit with the Court,  
9 to be filed under seal.

10 In accordance with the Order, the parties stipulate as follows:

11 1. On or before November 28, 2012, Relator shall deposit with the Court, to be  
12 filed under seal, the following documents:

13 Bates Stamped Document Nos.:

14 BS 43 - BS 44

15 BS 52 - BS 61

16 BS 64 - BS 102

17 BS 104 - BS 107

18 BS 456 - BS 561

19 BS 825

20 BS 828

21 BS 1544 - BS 2061

22 2. Neither Relator, nor any of her past or current attorney(s), shall retain any  
23 copies of the Documents deposited with the Court, either in paper or electronic format or  
24 in redacted or unredacted format.

3. As to the census sheets, Bates Stamp Nos. BS 1544 - BS 2053, Relator shall submit a document to the Court that assigns each patient with a unique number, and Relator shall only be entitled to retain a copy of the list of unique numbers, excluding patient names. To the extent that Plaintiff has existing knowledge of a patient's name, Plaintiff can use that name to seek to propound authorized discovery regarding that patient.

Dated: November 28, 2012

COLLEEN FLYNN

MARK KLEIMAN  
DISABILITY RIGHTS LEGAL CENTER  
Attorneys for Plaintiff/Relator

By:/s/Colleen Flynn  
Colleen Flynn

Dated: November 28, 2012

PATRIC HOOPER  
HOOPER, LUNDY & BOOKMAN, P.C.  
Attorneys for Defendant  
LINDA PARKS

By:/s/Patric Hooper  
Patric Hooper

Dated: November 28, 2012

DEBRA A. SPICER  
ALAN G. GILCHRIST  
Attorneys for Defendants  
AURORA LAS ENCINAS, LLC and  
SIGNATURE HEALTHCARE SERVICES, LLC

By:/s/Debra A. Spicer  
Debra A. Spicer

By:/s/Alan G. Gilchrist  
Alan G. Gilchrist

1  
**PROOF OF SERVICE**

2 **STATE OF MICHIGAN, COUNTY OF OAKLAND**

3 As the time of service, I was over 18 years of age and **not a party to this action**. I  
4 am employed in the County of Oakland, State of Michigan. My business address is  
5 29566 Northwestern Highway, Suite 200, Southfield, Michigan, 48034.

6 On November 29, 2012, I served true copies of the following document(s)  
7 described as **STIPULATION OF THE PARTIES REGARDING DOCUMENTS TO**  
8 **BE FILED UNDER SEAL PURSUANT TO COURT ORDER** on the interested  
9 parties in this action as follows:

10 **SEE ATTACHED SERVICE LIST**

11 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the  
12 persons at the addresses listed in the Service List and placed the envelope for collection  
13 and mailing, following our ordinary business practices. I am readily familiar with The  
14 Health Law Partners, P.C.'s practice for collecting and processing correspondence for  
15 mailing. On the same day that the correspondence is placed for collection and mailing, it  
16 is deposited in the ordinary course of business with the United States Postal Service, in a  
17 sealed envelope with postage fully prepaid.

18 **CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s)  
19 with the Clerk of the Court by using the CM/ECF system. Participants in the case who  
20 are registered CM/ECF users will be served by the CM/ECF system. Participants in the  
21 case who are not registered CM/ECF users will be served by mail or by other means  
22 permitted by the court rules.

23 I declare under penalty of perjury under the laws of the United States of America  
24 that the foregoing is true and correct and that I am employed in the office of a member of  
25 the bar of this Court at whose direction the service was made.

26 Executed on November 29, 2012, at Southfield, Michigan.

27  
28 /s/Marianna M. McIntyre  
Marianna M. McIntyre

## SERVICE LIST

**UNITED STATES OF AMERICA, *ex rel.*, SHELBY EIDSON vs.  
AURORA LAS ENCINAS, LLC, *et al.*  
Case No. 2:10-cv-1031 JAK (RZx)**

**Colleen Flynn, Esq.**  
3435 Wilshire Blvd., Suite 2910  
Los Angeles, CA 90010  
Telephone: (213) 252-9444  
Facsimile: (213) 252-0091  
E-Mail: [cflynnlaw@yahoo.com](mailto:cflynnlaw@yahoo.com)

Attorney for Plaintiff,  
*Shelby Eidson*

*Via CM/ECF*

**Mark A. Kleiman, Esq.**  
Law Offices of Mark Allen Kleiman  
2907 Stanford Avenue  
Venice, CA 90292  
Telephone: (310) 306-8094  
Facsimile: (310) 306-8491  
E-Mail: [mkleiman@quitam.org](mailto:mkleiman@quitam.org)

Attorney for Plaintiff,  
*Shelby Eidson*

### *Via CM/ECF*

**Paula Pearlman, Esq.**  
**Maria Michelle Uzeta, Esq.**  
**Peggy A. Farrell, Esq.**  
**Rebecca Craemer, Esq.**  
Disability Rights Legal Center  
800 S. Figueroa Blvd., Suite 1120  
Los Angeles, CA 90017  
Telephone: (213) 736-1477  
Facsimile: (213) 736-1428  
E-Mail: [paula.pearlman@lls.edu](mailto:paula.pearlman@lls.edu)  
[michelle.uzeta@lls.edu](mailto:michelle.uzeta@lls.edu)  
[peggy.farrell@lls.edu](mailto:peggy.farrell@lls.edu)  
[rebecca.craemer@lls.edu](mailto:rebecca.craemer@lls.edu)

Attorneys for Plaintiff,  
*Shelby Eidson*

*Via CM/ECF*

1                   **David Martin Harris, Esq.**  
2                   AUSA United States Attorney's Office  
3                   300 N. Los Angeles Street, Rm. 7516  
4                   Los Angeles, CA 90012  
5                   Telephone: (213) 894-8817  
6                   Facsimile: (213) 894-2380  
7                   E-Mail: david.m.harris@usdoj.gov

Attorneys for Plaintiff,  
*United States of America*

*Via CM/ECF*

6                   **Andrew Penn, Esq.**  
7                   U.S. Department of Justice – Civil Div.  
8                   Commercial Litigation Branch, Fraud Section  
9                   601 D St., NW, Room 9149  
10                  Washington, DC 20004  
11                  Telephone: (202) 305-3071  
12                  Facsimile: (202) 305-4117

Attorneys for Plaintiff,  
*United States of America*

*Via U.S. Mail*

12                  **Patric Hooper, Esq.**  
13                  Hooper, Lundy & Bookman, P.C.  
14                  1875 Century Park East, Suite 1600  
15                  Los Angeles, CA 90067-2517  
16                  Telephone: (310) 551-8111  
17                  Facsimile: (310) 551-8181  
18                  E-Mail: phooper@health-law.com

Attorneys for Defendant  
*Linda Parks*

*Via CM/ECF*

19                  **Debra A. Spicer, Esq.**  
20                  Law Office of Debra A. Spicer, P.C.  
21                  The Penobscot Building  
22                  645 Griswold St., Suite 1717  
23                  Detroit, MI 48226  
24                  Telephone: (313) 961-2100  
25                  Facsimile: (313) 961-2333  
26                  E-Mail: dspicer@spicerlaw.com

Attorneys for Defendants,  
*Signature Healthcare Services, LLC*  
and *Aurora Las Encinas, LLC*

*Via CM/ECF*